

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

FILED
U.S. DISTRICT COURT
MIDDLE DISTRICT OF TENN.

MAR 20 2024

UNITED STATES OF AMERICA

v.


CAMILO CAMPOS-HURTADO

a/k/a "Camilo Campos"

a/k/a "Arturo Lopez"

a/k/a "Hurtado Camilo Campos"

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NO. 3:24-00064  DEPUTY CLERK

18 U.S.C. § 1028(a)(6)

18 U.S.C. § 1028(b)(6)

18 U.S.C. § 1546(a)

18 U.S.C. § 2251(a)

18 U.S.C. § 2252(a)(2)

18 U.S.C. § 2252(b)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES:

Between on or about January 1, 2017, and on or about January 8, 2021, in the Middle District of Tennessee, the defendant, **CAMILO CAMPOS-HURTADO, a/k/a "Camilo Campos," a/k/a "Arturo Lopez," a/k/a "Hurtado Camilo Campos,"** did employ, use, persuade, induce, entice, and coerce Minor Victim 1 to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and the defendant knew and had reason to know that the visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate commerce, and the visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2251(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES:

Between on or about June 25, 2020, and on or about October 10, 2021, in the Middle District of Tennessee, the defendant, **CAMILO CAMPOS-HURTADO, a/k/a “Camilo Campos,” a/k/a “Arturo Lopez,” a/k/a “Hurtado Camilo Campos,”** did employ, use, persuade, induce, entice, and coerce Minor Victim 2 to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and the defendant knew and had reason to know that the visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate commerce, and the visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2251(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES:

Between on or about April 14, 2018, and on or about November 3, 2019, in the Middle District of Tennessee, the defendant, **CAMILO CAMPOS-HURTADO, a/k/a “Camilo Campos,” a/k/a “Arturo Lopez,” a/k/a “Hurtado Camilo Campos,”** did employ, use, persuade, induce, entice, and coerce Minor Victim 3 to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and the defendant knew

and had reason to know that the visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate commerce, and the visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2251(a).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES:

Between on or about January 13, 2013, and on or about June 12, 2013, in the Middle District of Tennessee, the defendant, **CAMILO CAMPOS-HURTADO, a/k/a “Camilo Campos,” a/k/a “Arturo Lopez,” a/k/a “Hurtado Camilo Campos,”** did employ, use, persuade, induce, entice, and coerce Minor Victim 4 to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and the defendant knew and had reason to know that the visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate commerce, and the visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2251(a).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES:

Between on or about March 20, 2019, and on or about June 23, 2023, in the Middle District of Tennessee, the defendant, **CAMILO CAMPOS-HURTADO, a/k/a “Camilo Campos,” a/k/a “Arturo Lopez,” a/k/a “Hurtado Camilo Campos,”** knowingly received any visual depiction using any means and facility of interstate and foreign commerce, which visual depiction has been mailed, and which visual depiction has been shipped and transported in and affecting interstate and foreign commerce, by any means including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction is of such conduct.

In violation of Title 18, United States Code, Sections 2252(a)(2) and (b).

COUNT SIX

THE GRAND JURY FURTHER CHARGES:

On or about June 23, 2023, in the Middle District of Tennessee, the defendant, **CAMILO CAMPOS-HURTADO, a/k/a “Camilo Campos,” a/k/a “Arturo Lopez,” a/k/a “Hurtado Camilo Campos,”** did knowingly possess a document prescribed by statute and regulation for entry into the United States and as evidence of authorized stay and employment in the United States, to wit: a legal permanent resident card, a resident alien card, and a social security card, which he knew to be forged, counterfeited, altered, falsely made, and otherwise unlawfully obtained.

In violation of Title 18, United States Code, Section 1546(a).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES:

On or about June 23, 2023, in the Middle District of Tennessee, the defendant, **CAMILO CAMPOS-HURTADO, a/k/a “Camilo Campos,” a/k/a “Arturo Lopez,” a/k/a “Hurtado Camilo Campos,”** did knowingly possess an identification document and authentication feature, to wit: a legal permanent resident card, a resident alien card, and a social security card, that are and appear to be an identification document and authentication feature of the United States and which are stolen and produced without lawful authority.

In violation of Title 18, United States Code, Sections 1028(a)(6) and (b)(6).

FORFEITURE ALLEGATION

1. The allegations contained in this Indictment are re-alleged and incorporated by reference as if fully set forth in support of this forfeiture.

2. Upon conviction of one or more of the offenses alleged in Counts One through Five of this Indictment, the defendant, **CAMILO CAMPOS-HURTADO, a/k/a “Camilo Campos,” a/k/a “Arturo Lopez,” a/k/a “Hurtado Camilo Campos,”** shall forfeit to the United States, pursuant to 18 U.S.C. § 2253:

(a) Any visual depiction described in 18 U.S.C. §§ 2251 or 2252A, or any book, magazine, periodical, film, videotape or other matter which contains any such visual depiction which was produced, transported, mailed, shipped or received in violation of law;

(b) Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

(c) Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense(s) or any property traceable to such property including but not limited to:

Any electronic devices seized from the residence of the defendant, **CAMILO CAMPOS-HURTADO, a/k/a “Camilo Campos,” a/k/a “Arturo Lopez,” a/k/a “Hurtado Camilo Campos,”** or that he abandoned on June 22, 2023, including, but not limited to, the following:

- iPhone 8
- iPhone 4
- SanDisk SD card
- Sony Digital Video Camera
- Acer Tablet

3. Upon conviction of the offense alleged in Count Six of the Indictment, the defendant, **CAMILO CAMPOS-HURTADO, a/k/a “Camilo Campos,” a/k/a “Arturo Lopez,” a/k/a “Hurtado Camilo Campos,”** shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(6):

- (a) any property, real or personal, constituting or traceable to the proceeds obtained directly or indirectly from the commission of the offense; and
- (b) any property, real or personally that was used to facilitate, or was intended to be used to facilitate, the commission of the offense.

The property to be forfeited includes, but is not limited to, the following:

- Three counterfeit social security cards;
- Two counterfeit legal permanent resident cards; and
- One counterfeit resident alien card.

4. Upon conviction of the offense alleged in Count Seven of the Indictment, the defendant, **CAMILO CAMPOS-HURTADO, a/k/a “Camilo Campos,” a/k/a “Arturo Lopez,” a/k/a “Hurtado Camilo Campos,”** shall forfeit to the United States pursuant to 18 U.S.C. § 1028(b)(5) and 21 U.S.C. § 853:

- (a) any property, real or personal, constituting or traceable to the proceeds obtained directly or indirectly from the commission of the offense; and
- (b) any property, real or personally that was used to facilitate, or was intended to be used to facilitate, the commission of the offense.

The property to be forfeited includes, but is not limited to, the following:

- Three counterfeit social security cards;
- Two counterfeit legal permanent resident cards; and
- One counterfeit resident alien card.

A TRUE BILL


FOREPERSON

HENRY C. LEVENTIS
UNITED STATES ATTORNEY



MONICA R. MORRISON
KATHRYN RISINGER
ASSISTANT UNITED STATES ATTORNEYS